

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 18-CR-130

BRET NAGGS, MARK WOGSLAND, and  
PETER ARMBRUSTER,

Defendants.

**DEFENDANT MARK WOGSLAND'S MOTION FOR SANTIAGO PROFFER**

Defendant Mark Wogsland, by his undersigned counsel, hereby moves for an order requiring the government to file a written *Santiago* proffer with 60 days, identifying all co-conspirators and any co-conspirator statements it intends to present at trial. In support of the motion, Mr. Wogsland adopts and incorporates the Memorandum of Law submitted by co-defendant Bret Naggs on October 18, 2019.

Respectfully submitted this 18th day of October, 2019.

Respectfully submitted,

MARK WOGSLAND

By: s/ Ryan S. Hedges  
One of His Attorneys

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Dated: October 18, 2019

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing motion was served on all attorneys of record in the above captioned case via the CM/ECF electronic filing system on October 18, 2019.

/s/ Ryan S. Hedges  
Ryan S. Hedges